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Attorney for Plaintiff,
TAMARA DOUKAS

THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
DIVISION OF SAN FRANCISCO

TAMARA DOUKAS, an individual,

Plaintiff,

vs.

COUNTY OF SAN MATEO, a public
entity, PENINSULA HUMANE
SOCIETY, a private non-profit
organization, DEBI DENARDI, an
individual, KIM HADDAD, an
individual, and DOES 1 through 50,
inclusive,

Defendants.

Case No.: 08 2336 SI

**DECLARATION OF TAMARA DOUKAS
IN SUPPORT OF PLAINTIFF'S BRIEF
RE: JURISDICTION**

Hearing Date/Time: October 3, 2008 9:00 a.m.
Hearing Judge: Hon. Susan Illston

I, Tamara Doukas, declare:

1. I am the Plaintiff in this action.

2. My qualifications include:

a. With my medical background and responsible care for Kodiak over 13 years, I
had full knowledge of Kodiak's medical history and health status.

b. PhD candidate at Stanford University School of Medicine in the Department

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of Microbiology and Immunology

- c. Master of Science degree in Biological Sciences from Stanford University
- d. Editor-in-Chief Emeritus and Science Advisor of Stanford Scientific Magazine
- e. Scientific/Biological Researcher at NASA Ames Research Center
- f. Research consultant, Department of Electrical Engineering, Stanford University
- g. One of the central volunteer members of the Bay Area's animal rescue and rehabilitation organization "Mickaboo Bird Rescue"
- h. Volunteer at rescue organization "California Chinchilla Rescue"
- i. Science and math tutor to kids of all ages

3. On August 2, 2006, I took my dog Kodiak to the San Mateo Animal Hospital due to an acute illness caused by the consumption of a very large amount of chicken liver. At the time, Kodiak was 13 years old, and I would compare him to an 80 year old person. He was aging, but basically healthy and enjoying a very full and happy life, taking daily walks with me and receiving excellent care. He quite possibly could have had another year of quality life left. At the time of the incident and now, my opinion based on his medical records, visits with different veterinarians, and based on my knowledge of medicine, is that his medical records show that he was an elderly dog who was in general good health. Additionally, the Alaskan Malamute life span is 12-15 years, and his mother lived to be almost 15.
4. I am blessed with many friends and close family and what I consider to be a very successful career. But Kodiak was my best friend for 13 years, and I deeply loved

1 him. I always took extremely good care of him and I was very attentive to him and his
2 quality of life.

3
4 5. On August 2, 2006, Officer Debi Denardi appeared at the San Mateo Animal Hospital
5 without prior notice to me, ½ hour after I arrived there with Kodiak. Refusing to give
6 Kodiak diagnostic testing or treatment, Denardi and Haddad spent 3 hours
7 demanding that Kodiak be killed immediately. They refused to perform any
8 diagnostic testing or treatment. They would not allow me to leave the hospital in
9 order to obtain vet care elsewhere from any other vet. Haddad expressed that her
10 personal opinion is that old animals and humans should be put to sleep, and she
11 declared that she had the authority to enforce euthanasia of an old animal. I asked for
12 the right to have a second opinion, and they declined. Denardi told me that "This dog
13 is not leaving this hospital alive."

14 6. No rational person could honestly state that I consented to Denardi, Haddad, or any
15 other person killing Kodiak. He was forcibly killed over my objections. I did not
16 physically interfere due to my understanding that Denardi was a police officer who
17 declared that I would be charged with felony animal abuse if I tried to receive
18 medical care for Kodiak or defy her commands to have Kodiak immediately put to
19 sleep.

20 I declare under penalty of perjury under the laws of the State of California that the
21 foregoing is true and correct and that this declaration was executed on August 29, 2008, at Palo
22 Alto, San Francisco, CA.

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24 _____/S/
25 TAMMY DOUKAS

26 _____
27 DECLARATION OF TAMARA DOUKAS
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